

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Shirley Viverette)
)
) Case No: 17 B 04355
) Judge: Hunt
) Chapter 13
Debtor)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S Michigan, Ste. 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Shirley Viverette, 1614 N. Central Ave, Chicago, IL 60639

Creditor: Ocwen Loan Servicing LLC, P.O. Box 24736, West Palm Beach, FL 33416.

Creditor's Attorney: Codilis & Associates, 15W030 North Frontage Rd, Suite 100, Burr Ridge, IL 60527

See Attached Service List

PLEASE TAKE NOTICE that on July 22, 2019 at 9:30 a.m.,

or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Hunt,

or any other Bankruptcy Judge presiding in her place in Courtroom 719 of the Dirksen

Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion to

Modify Plan, and shall request that the attached Order be entered, at which time you may

appear if so desired.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before June 26, 2019.

/s/ Angelica Harb
Angelica Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001

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 Label Matrix for local noticing 0752-1
 Case 17-04355 Northern District of Illinois Eastern Division
 Fri Jun 21 17:33:49 CDT 2019
 U.S. Bankruptcy Court Eastern Division 219 S Dearborn 7th Floor Chicago, IL 60604-1702
 American InfoSource LP as agent for T Mobile/T-Mobile USA Inc PO Box 248848 Oklahoma City, OK 73124-8848
 Cavalry Investments, LLC 500 Summit Lake Drive, Ste 400 Valhalla, NY 10595-2321
 Codilis & Associates, P.C. Bankruptcy Department 15W030 North Frontage Rd., Ste. 100 Burr Ridge, IL 60527-6921
 Diamond Window Company 5030 W Lawrence Ave. Chicago, IL 60630-3822
 (p)FORD MOTOR CREDIT COMPANY P O BOX 62180 COLORADO SPRINGS CO 80962-2180
 Ocwen Loan Servicing, LLC 1661 Worthington Rd., Ste. 100 West Palm Beach, FL 33409-6493
 Quantum3 Group LLC as agent for MOMA Funding LLC PO Box 788 Kirkland, WA 98083-0788
 The Outsource Group 3 Cityplace Dr. Saint Louis, MO 63141-7089
 Deutsche Bank National Trust Company as Tru Codilis and Associates, P.C. 15W030 N. Frontage Road, Suite 100 Burr Ridge, IL 60527-6921
 Acceptance Now 5501 Headquarters Dr. Plano, TX 75024-5837
 (p)CAINE & WEINER COMPANY 12005 FORD ROAD 300 DALLAS TX 75234-7262
 CitiFinancial Mortgage Company Inc 4050 Regent Irving, TX 75063-2246
 Comenity Bank/Avenue PO BOX 182125 Columbus, OH 43218-2125
 Diamond Window Company c/o Allan Levin 221 S. LaSalle, Ste. 2036 Chicago, IL 60601
 IL Bell Telephone Company Karen Cavagnaro, Paralegal One AT&T Way, Room 3A104 Bedminster, NJ 07921-2693
 (p)PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067
 Sherman & Purcell 120 S. LaSalle St. #1460 Chicago, IL 60603-3575
 (p)TOYOTA MOTOR CREDIT CORPORATION PO BOX 8026 CEDAR RAPIDS IA 52408-8026
 American InfoSource as agent for T Mobile PO Box 248848 Oklahoma City, OK 73124-8848
 Capital One c/o Portfolio Recovery Assoc. PO Box 41067 Norfolk, VA 23541-1067
 CitiFinancial Servicing LLC PO Box 6043 Sioux Falls, SD 57117-6043
 Comenity Bank/jssclndn PO BOX 182789 Columbus, OH 43218-2789
 First Premier Bank PO Box 2208 Vacaville, CA 95696-8208
 Lou Harris 613 Academy Dr Northbrook, IL 60062-2420
 Quantum3 Group LLC PO Box 788 Kirkland, WA 98083-0788
 Syncb/Carcare One PO BOX 965036 Orlando, FL 32896-5036
 Angelica Harb Law Office of Jason Blust, LLC 211 W. Wacker Dr., Ste. 300 Chicago, IL 60606-1390

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Jason Blust Marilyn J Marshall Patrick S Layng
Law Office of Jason Blust, LLC 224 South Michigan Ste 800 Office of the U.S. Trustee, Region 11
211 W. Wacker Drive Chicago, IL 60604-2503 219 S Dearborn St
Ste. 300 Room 873
Chicago, IL 60606-1390 Chicago, IL 60604-2027

Shirley W Viverette
1614 N. Central Ave.
Chicago, IL 60639-4115

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Caine & Weiner PO Box 5010 Woodland Hills, CA 91365	Ford Motor Credit Company LLC PO Box 62180 Colorado Springs, CO 80962	(d) Ford Motor Credit Corporation Ford Credit National Bankruptcy Ctr Po Box 537901 Livonia, MI 48153
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Portfolio Recovery Associates PO Box 41067 Norfolk, VA 23541	(d) Portfolio Recovery Associates, LLC Successor to CAPITAL ONE, N.A. (CAPITAL ONE) POB 41067 Norfolk, VA 23541	(d) Portfolio Recovery Associates, LLC Successor to SYNCHRONY BANK (CAR CARE ONE) POB 41067 Norfolk, VA 23541
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Toyota Motor Credit
PO BOX 8026
Cedar Rapids, IA 52408

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) FORD MOTOR CREDIT COMPANY LLC	(d) Cavalry Investments, LLC 500 Summit Lake Drive, Ste. 400 Valhalla, NY 10595-2321	End of Label Matrix Mailable recipients 33 Bypassed recipients 2 Total 35
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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
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IN RE: Shirley Viverette)
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) Case No: 17 B 04355
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MOTION TO MODIFY PLAN

Now comes Shirley Viverette(hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On February 15, 2017, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on June 26, 2017. The confirmed plan called for payments of \$620.00 per month for 2 months, and payments of \$640.00 per month for 58 months, paying unsecured creditors not less than 100% on their claims.
3. Section E5(a) of the confirmed plan currently provides for \$6,500.00 in pre-petition arrears to be paid to Ocwen Loan Servicing, LLC.
4. On June 7, 2019, this Honorable Court granted the Debtor’ Motion to Incur Debt to refinance her property located at 1614 N. Central Ave, Chicago, IL 60639.
5. The Debtor is scheduled to close with Nations Lending on June 27, 2019. Nations Lending Corporation will be paying the remaining balance owed to Ocwen Loan Servicing, LLC.

6. Debtor is requesting that the Trustee no longer pay the pre-petition arrears owed to Ocwen Loan Servicing, LLC.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

1. Modifying the Chapter 13 Plan to remove the set payments to Ocwen Loan Servicing, LLC in Section E5(a).
2. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Angelica Harb
Angelica Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001